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10 Attorneys for Defendant
11 Twitter, Inc.

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION
15

16 JOHN DOE #1 AND JOHN DOE #2,
17 Plaintiff,
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19 v.
20 TWITTER, INC.,
21 Defendant.
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Case No. 3:21-cv-00485-JCS

**DECLARATION OF LINH K. NGUYEN IN
SUPPORT OF STIPULATION AND
[PROPOSED] ORDER ON DEFENDANT
TWITTER INC.'S ANSWER TO THE FIRST
AMENDED COMPLAINT**

Judge: Hon. Joseph C. Spero
Trial Date: Not yet set

1 I, Linh K. Nguyen, declare as follows:

2 1. I am an attorney licensed to practice law in California and am an associate at Cooley,
3 LLP and counsel of record for Defendant Twitter, Inc. (“Twitter”) in this matter. I make this
4 declaration based on my personal knowledge of this matter and information I obtained following a
5 reasonable investigation of the events described below. If called as a witness, I could and would
6 testify competently to the matters stated herein.

7 2. I submit this declaration pursuant to Civil Local Rule 6-2(a) and in support of the
8 Parties’ Stipulation and Proposed Order re Defendant’s Answer to the First Amended Complaint
9 (“FAC”).

10 3. Plaintiffs filed a Complaint in the above-entitled action in U.S. District Court for the
11 Northern District of California on January 20, 2021;

12 4. On February 10, 2021, the Parties sought, and the court granted, an extension for
13 Twitter to respond to the Complaint and to extend the Initial Case Management Conference;

14 5. Plaintiffs filed the FAC on April 7, 2021;

15 6. On April 13, 2021, the Parties sought, and the court granted, a stipulated briefing
16 schedule for Twitter’s motion to dismiss the FAC and to extend the Initial Case Management
17 Conference;

18 7. On August 19, 2021, the court granted in part and denied in party Twitter’s motion
19 to dismiss the FAC;

20 8. On August 31, 2021, the Parties sought, and the court granted, a two-week extension
21 for Twitter to respond to the Complaint because counsel for Twitter had previously scheduled
22 vacation during Twitter’s response time;

23 9. Twitter’s deadline to answer the FAC is September 16, 2021;

24 10. Twitter is working diligently towards providing a comprehensive response to the
25 FAC and a short extension would permit Twitter to more adequately investigate the factual
26 allegations in the FAC;

27 11. The FAC contains 235 paragraphs of detailed factual allegations and is 55 pages
28 long;

1 12. A further Case Management Conference in this matter is currently set for November
2 5, 2021;

3 13. This modification would not affect the case schedule as none has been entered.

4 14. This modification will not affect any hearing or proceeding on the Court's calendar;

5 15. The Parties agree that a short six-day extension of Twitter's deadline to answer the
6 FAC is reasonable given the foregoing.

7 I declare under penalty of perjury that the foregoing is true and correct. This declaration
8 was executed on September 16, 2021 in San Diego, California.

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10 Dated: September 16, 2021

11 /s/ Linh K. Nguyen

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13 Linh K. Nguyen
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